

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

_____)	
DEMOCRACY FORWARD)	
FOUNDATION,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 18-00479 TSC
)	
DEPARTMENT OF STATE,)	
et al.,)	
)	
Defendants.)	
_____)	

ANSWER

Defendants, the Department of State (“State”), the Department of Homeland Security (“DHS”), and Citizenship and Immigration Services (“CIS”), hereby answer the complaint:

FIRST DEFENSE

Defendants are processing plaintiff’s Freedom of Information Act (“FOIA”) requests. As records are located and reviewed for release to plaintiff, some or all of the requested records may be exempt, in full or in part, from release under the FOIA exemptions.

SECOND DEFENSE

Defendants answer the numbered paragraphs of the complaint as follows:

1. This paragraph contains plaintiff’s characterization of its case as to which

no response is required.

2 and 3. These paragraphs contain conclusions of law as to which no response is required.

4. This paragraph contains conclusions of law as to which no response is required.

5. Defendants lack knowledge or information sufficient to form a belief about the truth of the allegations of this paragraph.

6. Admitted.

7. It is admitted that CIS is a federal agency; the remainder of this paragraph is a legal conclusion as to which no response is required.

8. It is admitted that State is a federal agency; the remainder of this paragraph is a legal conclusion as to which no response is required.

9 through 22. These paragraphs contain plaintiff's characterization of alleged background information, not allegations of fact pertinent to the resolution of the claims at issue in this Freedom of Information Act case. These paragraphs also summarize material cited in footnotes to the paragraphs, and the Court is referred to those materials, which are the best evidence of their contents.

23. This is plaintiff's characterization of the FOIA requests that it sent to the defendants, and the Court is referred to those FOIA requests, which are the best evidence of their contents.

24 through 27. Admitted.

28. Admitted, except that it should be noted that DHS has completed its search for responsive records.

29 to 36. Admitted.

37. This paragraph contains conclusions of law as to which no response is required.

38. Defendants incorporate herein their responses to the preceding paragraphs.

39. Denied.

The remainder of the complaint is plaintiff's request for relief, and defendant denies that plaintiff is entitled to any relief.

* * * * *

All allegations not expressly admitted or denied are denied.

WHEREFORE, defendants request this Court to deny plaintiff all relief requested, dismiss the complaint with prejudice, grant defendants such other relief as the Court deems appropriate, and award defendants the costs of this action.

Respectfully submitted,

JESSICA K. LIU, D.C. Bar #472845
United States Attorney

DANIEL F. VAN HORN, D.C. Bar #924092
Chief, Civil Division

BY: /s/ *Fred E. Haynes*
FRED E. HAYNES, D.C. Bar #165654
Assistant United States Attorney
555 Fourth Street, N.W., Room E-4110
Washington, D.C. 20530
202.252.2550
fred.haynes@usdoj.gov